



The Commonwealth of Massachusetts  
Executive Office of Health and Human Services  
Department of Public Health  
Bureau of Health Care Safety and Quality  
99 Chauncy St., 11<sup>th</sup> Floor  
Boston, MA 02111

CHARLES D. BAKER  
Governor

KARYN E. POLITO  
Lieutenant Governor

MARYLOU SUDDERS  
Secretary

MONICA BHAREL, MD, MPH  
Commissioner

Tel: 617-624-6000  
[www.mass.gov/dph](http://www.mass.gov/dph)

**Circular Letter: DHCQ 16-4-659**

TO: Non - Acute Hospital\* Chief Executive Officers

FROM: Eric Sheehan, JD  
Interim Director, Bureau of Health Care Safety and Quality

DATE: April 19, 2016

RE: Important Change in Reporting Seasonal Influenza Vaccination of Healthcare Personnel (HCP) at Massachusetts Non-Acute Hospitals\* for the 2015-2016 Influenza Season

The purpose of this circular letter is to inform Massachusetts Non-Acute Hospitals\* of the steps needed to fulfill the Massachusetts Department of Public Health (MDPH) and Centers for Medicare and Medicaid Services (CMS) requirement to submit HCP influenza data to the Centers for Disease Control and Prevention's (CDC) National Healthcare Safety network (NHSN) by May 15, 2016.

**Background**

As a condition of licensure, MDPH regulations require all licensed healthcare facilities to:

- Offer free-of-charge, annual influenza vaccine to all personnel (full and part-time employees, contracted employees, volunteers, house staff and students);
- Document receipt of influenza vaccine administered within and outside the facility or document the declination of immunization; and
- Report information to MDPH, documenting compliance with the vaccination requirement, in accordance with reporting and data collection guidelines of the Commissioner (105 CMR 130.130.325.<sup>1</sup> MDPH regulations do not allow for reporting unknown vaccine status.

---

<sup>1</sup>105 CMR 130.325, 105 CMR 140.150, 105 CMR 150.002(D)(8)

† See 105 CMR 140.150(H)(1).

\*The MDPH designation of Non-Acute Hospital includes Inpatient Psychiatric Facilities, Inpatient Rehabilitation Facilities, and Long Term Acute Care Hospitals.

### **Reporting Changes for the 2015 - 2016 Influenza Season**

CMS published final rules in the *Federal Register* for facilities participating in CMS quality reporting programs that included healthcare personnel (HCP) influenza vaccination summary reporting from inpatient psychiatric facilities<sup>1</sup>, long term care hospitals<sup>2</sup>, and inpatient rehabilitation facilities<sup>3</sup> via the Centers for Disease Control and Prevention's (CDC) National Healthcare Safety Network (NHSN). NHSN is an internet-based application created and managed by the CDC for patient and healthcare personnel safety surveillance.

To fulfill the CMS requirement and avoid unnecessary duplicate reporting, MDPH is transitioning the mandatory reporting of HCP influenza vaccination data in Non-Acute Hospitals\* from an excel spreadsheet to NHSN. The MDPH reporting requirement will be considered met upon each Non-Acute Hospital\* reporting HCP influenza vaccination data to the NHSN beginning with the 2015-2016 influenza season and making the data available to MDPH in NHSN.

### **MDPH Requirement**

#### **Reporting Changes for the 2015 – 2016 Influenza Season**

**Beginning with the 2015-2016 influenza season, Non-Acute Hospitals\* must report summary data on influenza vaccination of HCP to the CDC's NHSN.**

**All Non-Acute Hospitals\* must also "JOIN" the MDPH NHSN "Group" and "Confer Rights" to the data to MDPH. Please see the attached guidance to complete this requirement.**

#### **Change in MDPH Data Submission Deadline**

**For purposes of administrative simplification, MDPH has aligned the deadline for submission of HCP influenza summary data by Non-Acute Hospitals\* with the CMS deadline.**

**All HCP influenza data must be entered into NHSN by May 15, 2016.**

The attached document **"Instructions for Joining and Conferring Rights to the MDPH Non-Acute Hospital\* National Healthcare Safety Network Group"** is specifically for Massachusetts Non-Acute Hospitals\*. This process grants MDPH permission to view and analyze the HCP influenza vaccination data and must be completed by each facility to comply with the state requirement.

Please forward this circular letter to all persons in your healthcare facility responsible for infection prevention, employee health, and quality management reporting including: Infection Preventionists, Occupational Health Professionals, Chief Nursing Officers, Directors of Quality Improvement, and Directors of Human Resources.

Seasonal influenza vaccination is an effective method of preventing influenza virus infection and its potentially serious complications. MDPH is committed to working with you to ensure that patients and personnel are protected. Thank you for your ongoing participation in this important initiative. Please submit questions concerning the reporting and data submission requirements to Eileen McHale at 617-753-7324 or [Eileen.mchale@state.ma.us](mailto:Eileen.mchale@state.ma.us)

\*The MDPH designation of Non-Acute Hospital includes Inpatient Psychiatric Facilities, Inpatient Rehabilitation Facilities, and Long Term Acute Care Hospitals.

The NHSN protocol, training, reporting forms, survey and instructions are available on the NHSN website at the following link: <http://www.cdc.gov/nhsn/ltach/vaccination/index.html>

cc: Monica Bharel MD, MPH  
Alfred DeMaria, Jr., MD

---

<sup>1</sup> US Department of Health and Human Services. Medicare Program; Inpatient Psychiatric Facilities Prospective Payment System—Update for Fiscal Year Beginning October 1, 2014 (FY 2015); Final Rule Federal Register 2014; 79:45968-45970. <http://www.gpo.gov/fdsys/pkg/FR-2014-08-06/pdf/2014-18329.pdf>

<sup>2</sup> US Department of Health and Human Services. Medicare Program; Hospital Inpatient Prospective Payment Systems for Acute Care Hospitals and the Long Term Care; Hospital Prospective Payment System and Fiscal Year 2014 Rates; Quality Reporting Requirements for Specific Providers; Hospital Conditions of Participation; Payment Policies Related to Patient Status; Final Rule Federal Register 2013;78:50857-50858. <http://www.gpo.gov/fdsys/pkg/FR-2013-08-19/pdf/2013-18956.pdf>

<sup>3</sup> US Department of Health and Human Services. Medicare Program; Inpatient Rehabilitation Facility Prospective Payment System for Federal Fiscal Year 2014; Final Rule Federal Register 2013; 78:47905-47906. <http://www.gpo.gov/fdsys/pkg/FR-2013-08-06/pdf/2013-18770.pdf>

\*The MDPH designation of Non-Acute Hospital includes Inpatient Psychiatric Facilities, Inpatient Rehabilitation Facilities, and Long Term Acute Care Hospitals.